

# **Exhibit E**

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

-----X  
THE ABI JAUDI AND AZAR TRADING CORP., :  
:  
Plaintiff, : Civil Action No. 91-6785  
:  
-against- :  
CIGNA WORLDWIDE INSURANCE CO. :  
:  
Defendant. :  
:  
-----X

**DEFENDANT CIGNA WORLDWIDE INSURANCE CO.'S  
INTERROGATORIES TO RESPONDENT JAMES LITTLE**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Respondent James Little ("You") are required to answer, under oath, the Interrogatories set forth below within thirty (30) days of service thereof, exclusive of the date of service, and to serve a copy of said responses upon counsel for Defendant Cigna Worldwide Insurance Co. ("CWW") at the offices of Debevoise & Plimpton LLP, 919 Third Avenue, New York, New York 10022.

**DEFINITIONS AND INSTRUCTIONS**

1. "Echemus" means any of the following entities: Echemus Group L.P., Echemus Investment Management Limited, Echemus International Limited, and EF (USA) LLC, and includes without limitation any director, officer, employee or any other person acting as an agent of the foregoing entities, as well as any parent companies, subsidiaries, affiliates, and predecessors of any of the foregoing entities.

2. “CCI” means CC International Ltd., a company organized under the laws of St. Kitts & Nevis, with its registered address at Dixcart Management Nevis Limited, P.O. Box 598, Dixcart House, Fort Charles, Charlestown, Nevis, Saint Kitts and Nevis.

3. The term “identify” when used herein in connection with natural persons means to state their full name, the address of the person’s present or last known residence, and the person’s present or last known place of employment.

4. The term “identify” when used in connection with a corporation, limited liability company, partnership, joint venture, or other legal entity means to state the legal entity’s full name, its jurisdiction of incorporation or organization, and the address and jurisdiction of its primary place (or places) of business.

5. You must answer each of the Interrogatories separately and fully.

6. If any of these Interrogatories cannot be answered in full, answer to the fullest extent possible and specify the reason for Your inability to answer the remainder and state whatever information or knowledge You have concerning the unanswered portion.

7. If You withhold any information called for by an Interrogatory by reason of a claim of privilege or work product, furnish a list setting forth as to each objection the nature of the privilege being asserted.

#### INTERROGATORIES

1. Identify all persons, natural or otherwise, who (i) own or control CCI, or otherwise have any interest (direct or indirect) in CCI, or (ii) from January 1, 2003 to the present (“the Relevant Period”) owned, controlled or had any interest (direct or indirect)

in CCI; including without limitation all persons who hold (or during the Relevant Period held) any ordinary or preferred shares of CCI.

2. Identify all persons, natural or otherwise, who (i) own or control St. Cleer LLC, or otherwise have any interest (direct or indirect) in St. Cleer LLC, or (ii) during the Relevant Period owned, controlled or had any interest in St. Cleer LLC.

3. Identify all persons, natural or otherwise, who during the Relevant Period provided any funds, directly or indirectly, to CCI, St. Cleer LLC, or to Josie Sesay or Foday Sesay in their capacity as Liberian-appointed receiver for the “Liberian Branch” of CWW.

4. Identify all persons, natural or otherwise, who (i) during the Relevant Period provided any funds to Echemus, including without limitation each general partner, limited partner, partner, shareholder, member or other interest-holder, of any Echemus entity; or (ii) have, or during the Relevant Period had, any interest, right or entitlement to receive any portion of any monies that may be realized by Echemus, including without limitation any person who received such an interest as compensation for his or her services as a director, officer, employee or agent of Echemus.

5. Identify all persons, natural or otherwise, who have paid, or been invoiced for, any legal fees or expenses relating to any of:

- (a) the above-captioned action in the United States District Court for the District of Pennsylvania, captioned *The Abi Jaoudi & Azar Trading Corp. v. CIGNA Worldwide Insurance Co.*, Civil Action No. 91-6785;
- (b) the action pending in the Grand Court of the Cayman Islands entitled *CIGNA Worldwide Insurance Company (by and through its court appointed receiver, Josie Senesie and in respect of the Assets,*

*Undertakings and affairs of its licensed Liberian branch and business) against ACE Limited, FSD Cause No 96 of 2011 (PCJ) (formerly Cause No 329 of 2008);*

- (c) the action currently pending in the Court of Chancery of the State of Delaware entitled *CIGNA Worldwide Insurance Co. v. Josie Senesie*, Civil Action No. 4171-VCL; or
- (d) the action in the Civil Law Court, Sixth Judicial Circuit, Montserrado County, Liberia, entitled *In the Matter of Section 5.13 of the Liberian Insurance Law and In the Matter of the Liberian Branch of CIGNA Worldwide Insurance Company (In Liquidation)*;

including without limitation any fees paid to or invoiced by any of the following lawyers or law firms: (i) Walkers, (ii) Law Firm Lohman, (iii) Martin Kenney & Co., Solicitors, (iv) Cllr. Thompson Jargba (v) Duane Morris LLP, (vi) Astigarraga Davis, (vii), Husch Blackwell Sanders, LLP, (viii) Reed Smith LLP, (ix) Anderson Kill & Olick, P.C., (x) Offit Kurman, or (xi) Wilks, Lukoff & Bracegirdle, LLC.

6. For any corporation, limited liability company, partnership, joint venture, or other legal entity identified in response to Interrogatories Nos. 1-5, identify all persons, natural or otherwise, who own, control, or otherwise have any interest, direct or indirect, in such legal entity.

Dated: May 11, 2012  
Philadelphia, Pennsylvania

DEBEVOISE & PLIMPTON LLP

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